

**Danielle M. Kays**

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**From:** Rory Valas [rav@franchiseelaw.com]  
**Sent:** Monday, April 14, 2008 4:52 PM  
**To:** Danielle M. Kays  
**Subject:** RE: Kumon v. Shah Supplemental Interrogatories

Where in the rules do interrogatories require a response in less than 7 days?

Our response:.. We object as insufficient time was provided to respond. Moreover, there was no date or identification provided for the photographs that are the subject of the interrogatories.

Rory

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**From:** Danielle M. Kays [mailto:[danielle.kays@chengcohen.com](mailto:danielle.kays@chengcohen.com)]  
**Sent:** Monday, April 14, 2008 5:48 PM  
**To:** Rory Valas  
**Subject:** RE: Kumon v. Shah Supplemental Interrogatories

The date and method of service are reflected in the certificate of service; in addition to serving you with the Supplemental Interrogatories via email on April 8, you received a hard copy via Fed Ex on April 9. Responses are due today.

**Danielle M. Kays**  
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**From:** Rory Valas [mailto:[rav@franchiseelaw.com](mailto:rav@franchiseelaw.com)]  
**Sent:** Monday, April 14, 2008 2:53 PM  
**To:** Danielle M. Kays  
**Subject:** RE: Kumon v. Shah Supplemental Interrogatories

We received those interrogatories with the deposition notices for the contract employees on Friday.

On what date do you claim that you served those interrogatories?

Rory

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**From:** Danielle M. Kays [mailto:[danielle.kays@chengcohen.com](mailto:danielle.kays@chengcohen.com)]  
**Sent:** Monday, April 14, 2008 3:30 PM  
**To:** Rory Valas  
**Cc:** CCaruso@schwartzcooper.com; srosenberg@schwartzcooper.com  
**Subject:** Kumon v. Shah Supplemental Interrogatories

Rory:

We have not received your client's response to Kumon's Supplemental Interrogatories which are due today. Please forward your responses.

**Danielle M. Kays**  
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